

# EXHIBIT

# A

Halberstam, Shimon

December 7, 2017

1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

-----x  
SHIMON HALBERSTAM, Trustee of the Zupnick  
Family Trust 2008 B,

Plaintiff,

-against-

Case No.

1:16-cv-06854-ARR-ST

ALLIANZ LIFE INSURANCE COMPANY OF NORTH AMERICA,  
Defendant.

----- x  
405 Lexington Avenue

New York, New York

December 7, 2017

11:25 a.m.

VIDEOTAPED DEPOSITION of SHIMON HALBERSTAM,  
Trustee of the Zupnick Family Trust 2008 B, the  
Plaintiff, by the Defendant in the above-entitled  
action, held at the above time and place, pursuant  
to Rule 30, taken before Charissa Hromadka, a  
shorthand reporter and Notary Public within and for  
the State of New York.

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Halberstam, Shimon

December 7, 2017

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<p style="text-align: right;">2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3</p> <p>4 LIPSIOUS-BENHAIM LAW, LLP</p> <p>5 Attorneys for Plaintiff</p> <p>6 80-02 Kew Gardens Road</p> <p>7 Kew Gardens, New York 11415</p> <p>8 BY: DAVID BENHAIM, ESQ.</p> <p>9 dbenhaim@lipsiuslaw.com</p> <p>10</p> <p>11 CARLTON FIELDS JORDEN BURT, P.A.</p> <p>12 Attorneys for Defendant</p> <p>13 1025 Thomas Jefferson Street, Suite 400W</p> <p>14 Washington, D.C. 20007-5208</p> <p>15 BY: ROLAND C. GOSS, ESQ.</p> <p>16 rgoss@carltonfields.com</p> <p>17</p> <p>18 ALSO PRESENT:</p> <p>19 DANIEL ORTEGA - Videographer</p> <p>20 ZISSY HALBERSTAM</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">4</p> <p>1 THE VIDEOGRAPHER: We are now on</p> <p>2 the record. My name is Daniel Ortega</p> <p>3 and I'm the legal videographer for</p> <p>4 Henderson Legal Services. Today's date</p> <p>5 is December 7, 2017, and the time is</p> <p>6 11:25 a.m. This video deposition is</p> <p>7 being held at 405 Lexington Avenue, New</p> <p>8 York, New York in the matter of Shimon</p> <p>9 Halberstam, Trustee of the Zupnick</p> <p>10 Family Trust versus Allianz Life</p> <p>11 Insurance for the United States</p> <p>12 District Court for the Eastern District</p> <p>13 of New York. The deponent is Shimon</p> <p>14 Halberstam.</p> <p>15 Counsel, please identify yourselves</p> <p>16 for the record.</p> <p>17 MR. BENHAIM: For the plaintiff,</p> <p>18 David Benhaim, Lipsius-Benhaim Law.</p> <p>19 MR. GOSS: For defendant, Allianz</p> <p>20 Life Insurance Company, Roland Goss of</p> <p>21 Carlton Fields Jordan Burt.</p> <p>22 THE VIDEOGRAPHER: The court</p> <p>23 reporter is Charissa Hromadka who will</p> <p>24 now administer the oath.</p> <p>25 MR. BENHAIM: He affirms.</p>
<p style="text-align: right;">3</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6 IT IS HEREBY STIPULATED AND AGREED, by and between</p> <p>7 the attorneys for the respective parties herein, that</p> <p>8 filing and sealing of the transcript be waived, and the</p> <p>9 same are hereby waived.</p> <p>10</p> <p>11 IT IS FURTHER STIPULATED AND AGREED that all</p> <p>12 objections, except as to the form of the question,</p> <p>13 shall be reserved to the time of the trial.</p> <p>14</p> <p>15 IT IS FURTHER STIPULATED AND AGREED that the</p> <p>16 within deposition may be sworn to and signed before any</p> <p>17 officer authorized to administer an oath, with the same</p> <p>18 force and effect as if signed and sworn to before the</p> <p>19 Court.</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">5</p> <p>1 MS. REPORTER: (Administering</p> <p>2 oath.)</p> <p>3 THE WITNESS: What you ask?</p> <p>4 MS. REPORTER: (Administering</p> <p>5 oath). Yes?</p> <p>6 THE WITNESS: No. Not understand</p> <p>7 what are you asking. My wife can</p> <p>8 explain it?</p> <p>9 MR. BENHAIM: They want to know at</p> <p>10 this point if you agree that everything</p> <p>11 you are going to say today is going to</p> <p>12 be the truth and the whole truth and</p> <p>13 nothing else but the truth. Do you</p> <p>14 agree that you are going to say the</p> <p>15 truth?</p> <p>16 MS. HALBERSTAM: (Speaking in</p> <p>17 Yiddish.)</p> <p>18 THE WITNESS: Yes, yes, yes.</p> <p>19 MR. BENHAIM: Are you capturing</p> <p>20 that at all?</p> <p>21 MS. REPORTER: Yeah, but she's</p> <p>22 speaking in Yiddish so --</p> <p>23 THE WITNESS: Okay. Can you ask</p> <p>24 me?</p> <p>25 MR. GOSS: We got it on the video.</p>

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<p style="text-align: right;">6</p> <p>1 MR. BENHAIM: Okay.</p> <p>2 THE WITNESS: Okay. Ask me.</p> <p>3 MR. BENHAIM: Are you doing</p> <p>4 speaking in Yiddish or --</p> <p>5 MS. REPORTER: Speaking Yiddish, is</p> <p>6 that okay, in brackets as a</p> <p>7 parenthetical?</p> <p>8 MR. BENHAIM: Yes. Is that okay</p> <p>9 with you?</p> <p>10 MR. GOSS: I guess. Let's proceed.</p> <p>11 THE WITNESS: Yes.</p> <p>12 EXAMINATION BY</p> <p>13 MR. GOSS:</p> <p>14 Q. What's your full name, sir?</p> <p>15 A. Shimon Halberstam.</p> <p>16 Q. Mr. Halberstam, my name is Roland Goss. We</p> <p>17 met yesterday and I am representing Allianz Life</p> <p>18 Insurance Company and we are here about an Insurance</p> <p>19 policy that insures the life of Dora Zupnick and that</p> <p>20 is owned by The Zupnick Family Trust 2008 B, which you</p> <p>21 are the trustee. Is that your understanding?</p> <p>22 A. Yes.</p> <p>23 Q. This is a deposition. That's what it's</p> <p>24 called. Have you been at a deposition before other</p> <p>25 than yesterday?</p>	<p style="text-align: right;">8</p> <p>1 here for the Blau (phonetic) case.</p> <p>2 Okay.</p> <p>3 Q. Was that a time when there was another</p> <p>4 gentleman who was talking to you?</p> <p>5 A. No, no. Nothing, no.</p> <p>6 Q. Let's go on. You were here yesterday, right,</p> <p>7 when your wife was deposed?</p> <p>8 A. Yes, yes.</p> <p>9 Q. Similar to yesterday, I will be asking you</p> <p>10 some questions. Just answer them the best you can.</p> <p>11 If at any time you don't understand me, let me know</p> <p>12 and I will try to make sure we understand each other</p> <p>13 before you answer. Okay?</p> <p>14 A. Yes.</p> <p>15 Q. When I hand you some documents, look at them</p> <p>16 before you answer anything so you make sure you can</p> <p>17 try and see what they are. Is that agreeable?</p> <p>18 A. Yes.</p> <p>19 Q. And if you want to take a break at any time</p> <p>20 let me know.</p> <p>21 A. Yes. Thank you.</p> <p>22 Q. What is your educational background?</p> <p>23 A. I'm not understanding what you are asking me.</p> <p>24 Q. School.</p> <p>25 A. Oh, I'm a student.</p>
<p style="text-align: right;">7</p> <p>1 A. Yes. Before yesterday?</p> <p>2 Q. Yes.</p> <p>3 A. Deposition? Yes, I have been more times</p> <p>4 before this.</p> <p>5 Q. Okay. How many times?</p> <p>6 A. One time with you.</p> <p>7 Q. And what was that -- was that about another</p> <p>8 lawsuit or this one?</p> <p>9 A. Not this place. We have it -- not at</p> <p>10 (speaking in Yiddish) -- we go with you by Brooklyn in</p> <p>11 the courtroom in Brooklyn.</p> <p>12 Q. A court in Brooklyn?</p> <p>13 A. Yes. The first time when you see me. The</p> <p>14 first time when you see me. Not a deposition, not a</p> <p>15 deposition. That's the first time when I see you.</p> <p>16 I'm sorry. I made a mistake.</p> <p>17 Q. When you and I met here up on another floor</p> <p>18 in another case?</p> <p>19 MR. BENHAIM: No.</p> <p>20 A. In the other building also. I saw you the</p> <p>21 first time in another building. Not in Manhattan. In</p> <p>22 Brooklyn. The first time.</p> <p>23 MR. BENHAIM: I think he's talking</p> <p>24 about the mediation conference.</p> <p>25 MR. GOSS: Okay. I thought he was</p>	<p style="text-align: right;">9</p> <p>1 Q. Pardon me?</p> <p>2 A. I'm a student.</p> <p>3 Q. Are you a student now?</p> <p>4 A. Yes.</p> <p>5 Q. At what school?</p> <p>6 A. The name is Ramu -- Kollel Ramu. It's in</p> <p>7 Williamsburg.</p> <p>8 MR. GOSS: Can you help the court</p> <p>9 reporter with the spelling?</p> <p>10 MR. BENHAIM: Kollel is</p> <p>11 K-O-L-L-E-L. Ramu, R-A-M-U.</p> <p>12 THE WITNESS: (Speaking in</p> <p>13 Yiddish.)</p> <p>14 Q. What are you studying, sir?</p> <p>15 A. Religion.</p> <p>16 Q. How long have you been a student at that</p> <p>17 school?</p> <p>18 A. The last ten years.</p> <p>19 Q. During those ten years, have you had any</p> <p>20 employment? Have you worked anywhere for</p> <p>21 compensation?</p> <p>22 MR. BENHAIM: You are going to have</p> <p>23 to use simple words.</p> <p>24 MR. GOSS: Okay.</p> <p>25 Q. During those ten years, have you had a job?</p>

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<p style="text-align: right;">10</p> <p>1 A. No jobs, no jobs.</p> <p>2 Q. And before those ten years, had you had a job</p> <p>3 at some point?</p> <p>4 A. I had a job before the accident for a few</p> <p>5 months, but after that I have no more jobs from the</p> <p>6 accident.</p> <p>7 Q. And when was the accident that you had? Do</p> <p>8 you remember?</p> <p>9 A. It's September -- it's '02, 2002. It's</p> <p>10 September.</p> <p>11 Q. That's fine. September 2002?</p> <p>12 A. September 2002, yes.</p> <p>13 Q. As a result of that accident, have you had</p> <p>14 some problems remembering things?</p> <p>15 A. Yes. I forgot very much things.</p> <p>16 Q. Are you taking any medication now?</p> <p>17 A. Yes.</p> <p>18 Q. Does that have any impact, do you know, on</p> <p>19 your memory?</p> <p>20 A. Yes. The medicine make it to forgot. Not to</p> <p>21 take -- it's helped not to take seizures, but it makes</p> <p>22 me forgot.</p> <p>23 Q. I understand you had some seizures in the</p> <p>24 past, correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">12</p> <p>1 Q. Let me ask you about some people.</p> <p>2 MR. BENHAIM: Do you have --</p> <p>3 THE WITNESS: Yeah, it's about 16,</p> <p>4 yes.</p> <p>5 Q. About 16 years, okay.</p> <p>6 Do you know a woman by the name of Dora</p> <p>7 Zupnick?</p> <p>8 A. Yes.</p> <p>9 Q. And have you spoken with her?</p> <p>10 A. Nothing, no, no.</p> <p>11 Q. Have you ever met her face to face?</p> <p>12 A. No.</p> <p>13 Q. You just have heard her name?</p> <p>14 A. Again, please.</p> <p>15 Q. You have heard her name but you have not</p> <p>16 spoken with her, correct?</p> <p>17 A. Yes, only heard the name, yes.</p> <p>18 Q. Do you have any familial relationship with</p> <p>19 her?</p> <p>20 A. No, nothing.</p> <p>21 Q. Do you know her son Abraham Zupnick?</p> <p>22 A. Yes.</p> <p>23 Q. Have you ever spoken with him yourself?</p> <p>24 A. Yes.</p> <p>25 Q. What have you spoken with him about?</p>
<p style="text-align: right;">11</p> <p>1 Q. Is your medication in part to help prevent</p> <p>2 that from reoccurring, happening?</p> <p>3 A. The doctor says it helps, yes.</p> <p>4 Q. If at any time you feel uncomfortable in</p> <p>5 terms medically and you want to take a break, let me</p> <p>6 know. Okay?</p> <p>7 A. Yes. Thanks.</p> <p>8 MR. BENHAIM: I do think it's</p> <p>9 important for us to have the</p> <p>10 medications identified.</p> <p>11 MR. GOSS: Can he do that or do you</p> <p>12 want to do it on the record?</p> <p>13 MR. BENHAIM: I think he can.</p> <p>14 Q. What are the names of the medications you are</p> <p>15 taking?</p> <p>16 A. One is Lamictal. I can show you. I have it</p> <p>17 with me now.</p> <p>18 Q. Just the names.</p> <p>19 A. The nams? Lamictal XR and the second is</p> <p>20 Depakote and the third is ONFI, O-N-F-I.</p> <p>21 Q. D-E-P-A-K-O-T-E.</p> <p>22 You are married, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Do you recall how long you have been married?</p> <p>25 A. About 16 years.</p>	<p style="text-align: right;">13</p> <p>1 A. About ten years ago we spoke about the</p> <p>2 policy, insurance policy. Not ten years. Less. Six</p> <p>3 years -- no, I spoke with him -- four years, yes.</p> <p>4 Q. About four?</p> <p>5 A. About -- I spoke with him when we opened the</p> <p>6 policy in '08. In '08 when we opened the policy I</p> <p>7 spoke with him.</p> <p>8 Q. So you spoke with Abraham about the time his</p> <p>9 mother was applying for this policy?</p> <p>10 A. No. I'm speaking only that I'm going to pay</p> <p>11 money for this policy.</p> <p>12 Q. And you talked with him about that, right?</p> <p>13 A. With Abraham Zupnick I spoke about the</p> <p>14 policy, yes.</p> <p>15 Q. How did --</p> <p>16 A. And the whole time -- the two years when he</p> <p>17 owned the trust.</p> <p>18 Q. While Mr. Zupnick was the trustee, you were</p> <p>19 paying some of the premiums, is that what you are</p> <p>20 saying?</p> <p>21 A. Yes.</p> <p>22 Q. Did you pay premiums from the beginning of</p> <p>23 the policy?</p> <p>24 A. Yes.</p> <p>25 Q. Did he ask you if you would be willing to do</p>

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<p style="text-align: right;">14</p> <p>1 that?</p> <p>2 MR. BENHAIM: Objection to the</p> <p>3 form.</p> <p>4 Q. How did you come to know about the policy?</p> <p>5 A. Because somebody tell me that I can make</p> <p>6 money -- to make money benefits and Abraham Zupnick,</p> <p>7 he told me if I'm going to pay this policy, I'm going</p> <p>8 to take benefits.</p> <p>9 Q. Was that at the time the policy was being</p> <p>10 created?</p> <p>11 MR. BENHAIM: Objection. I don't</p> <p>12 know if he even knows when the policy</p> <p>13 was created.</p> <p>14 MR. GOSS: I'm not looking for a</p> <p>15 date.</p> <p>16 Q. At the time you had that discussion with</p> <p>17 Mr. Zupnick --</p> <p>18 A. Yeah.</p> <p>19 Q. -- had Allianz already issued the policy or</p> <p>20 were they considering it, do you know?</p> <p>21 A. I'm not understanding what you are asking me.</p> <p>22 Q. Allianz -- for the insurance policy, in order</p> <p>23 to get a life insurance policy, an insured submits an</p> <p>24 application to the company saying I would like to have</p> <p>25 a policy and here is my information.</p>	<p style="text-align: right;">16</p> <p>1 Q. Do you know why Dora Zupnick wanted this</p> <p>2 policy?</p> <p>3 A. I don't know.</p> <p>4 Q. Do you know if Dora Zupnick ever paid any of</p> <p>5 the premiums?</p> <p>6 A. I don't know.</p> <p>7 Q. Was there anyone else besides you who was</p> <p>8 paying the premiums at the beginning?</p> <p>9 A. Yes.</p> <p>10 Q. Who was that?</p> <p>11 A. Melech Wagshal.</p> <p>12 Q. Is this Mr. Wagshal or --</p> <p>13 MR. BENHAIM: I think he said</p> <p>14 Melech.</p> <p>15 A. Melech Wagshal, Melech Wagshal.</p> <p>16 MR. BENHAIM: It's short for</p> <p>17 Elimelech.</p> <p>18 THE WITNESS: Elimelech, Elimelech.</p> <p>19 MR. GOSS: That's Mr. Wagshal and</p> <p>20 his wife is Miriam.</p> <p>21 Q. So that's Mr. Wagshal and his wife is Miriam,</p> <p>22 correct?</p> <p>23 A. Elimelech Wagshal.</p> <p>24 Q. Did you and he pay all the premiums at the</p> <p>25 beginning?</p>
<p style="text-align: right;">15</p> <p>1 A. Yes, yes.</p> <p>2 Q. And then the insurance company looks at it</p> <p>3 and if they agree, they say we will give you the</p> <p>4 policy and they give the policy to the person who</p> <p>5 applies for it.</p> <p>6 A. Who gave me the policy application?</p> <p>7 Q. The insurance company.</p> <p>8 A. Who gave me the application?</p> <p>9 Q. No. The person applying for the policy who</p> <p>10 wants the policy, Ms. Zupnick --</p> <p>11 A. Zupnick buys the policy, yes.</p> <p>12 Q. She gave Allianz an application saying I want</p> <p>13 insurance on my life and then Allianz said okay. We</p> <p>14 will do that and they gave her a policy. What I am</p> <p>15 trying to find out is: When you had your first</p> <p>16 discussion with Abraham Zupnick --</p> <p>17 A. Discussion --</p> <p>18 Q. -- about providing some money, do you know if</p> <p>19 she had already given her application to the insurance</p> <p>20 company?</p> <p>21 A. No.</p> <p>22 Q. Have you paid some money for premiums on the</p> <p>23 policy -- once you started, have you done it</p> <p>24 periodically ever since?</p> <p>25 A. I paid the whole time.</p>	<p style="text-align: right;">17</p> <p>1 MR. BENHAIM: Objection. There's</p> <p>2 no foundation.</p> <p>3 Q. Let me ask you a question: Do you know if</p> <p>4 anyone besides the two of you paid any premiums at the</p> <p>5 beginning?</p> <p>6 A. I -- I know I paid and Elimelech Wagshal.</p> <p>7 Q. Do you know if anyone else contributed any?</p> <p>8 A. No.</p> <p>9 Q. You don't know or you think not?</p> <p>10 A. I don't know. I don't know.</p> <p>11 Q. Do you have records about how much both you</p> <p>12 and Mr. Wagshal contributed?</p> <p>13 A. Not understand what you are asking me.</p> <p>14 Q. Do you have something written down that says</p> <p>15 how much money you contributed each time?</p> <p>16 A. He tells me. Not on paper.</p> <p>17 Q. Do you have anything in writing that shows</p> <p>18 how much Mr. Wagshal contributed at any time?</p> <p>19 A. No.</p> <p>20 Q. Do you know a gentleman by the name of</p> <p>21 Abraham Friedman?</p> <p>22 A. Yes.</p> <p>23 Q. How long have you known him?</p> <p>24 A. When we opened the policy.</p> <p>25 Q. Did you know him before then?</p>

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6 (Pages 18 to 21)

<p style="text-align: right;">18</p> <p>1 A. Maybe a few weeks before that.</p> <p>2 Q. But not for a long time before?</p> <p>3 A. No, no.</p> <p>4 Q. What do you understand --</p> <p>5 A. But Elimelech Wagshal I know a long time</p> <p>6 before that.</p> <p>7 Q. What has been Mr. Abraham Friedman's role</p> <p>8 with the policy, if you know?</p> <p>9 MR. BENHAIM: Objection to the</p> <p>10 form.</p> <p>11 MR. GOSS: Let me rephrase that.</p> <p>12 Q. Do you understand that Mr. Abraham Friedman</p> <p>13 is an insurance agent?</p> <p>14 A. Yes. A broker.</p> <p>15 Q. A broker, insurance broker?</p> <p>16 A. Yes.</p> <p>17 Q. Has he worked -- provided work and help with</p> <p>18 the policy?</p> <p>19 A. Not understanding what you are asking me.</p> <p>20 He's the broker.</p> <p>21 Q. As a broker, what does he do for the policy?</p> <p>22 A. He shows me the application, he showed me</p> <p>23 everything.</p> <p>24 Q. And then as you are paying money, does he</p> <p>25 come to you and ask you for money?</p>	<p style="text-align: right;">20</p> <p>1 pay every month.</p> <p>2 Q. When a bill comes from the insurance company,</p> <p>3 have you seen them?</p> <p>4 A. First -- they tell me that we have to pay.</p> <p>5 The company sends a bill and we have to pay for this</p> <p>6 bill.</p> <p>7 Q. Who is it who actually pays the bill?</p> <p>8 A. The bill, I pay.</p> <p>9 Q. Have you written checks for that?</p> <p>10 A. Yes, yes.</p> <p>11 Q. Sometimes do you use the bank and send a wire</p> <p>12 transfer?</p> <p>13 A. Yes.</p> <p>14 Q. And when Mr. Wagshal contributes, does he</p> <p>15 write a check or does he give the check to you?</p> <p>16 A. I don't know. Not give it to me.</p> <p>17 Q. So do you know how he makes his payments?</p> <p>18 A. No.</p> <p>19 Q. If a bill comes in for an amount, how did you</p> <p>20 and he decide how much each of you will pay?</p> <p>21 A. He calls me, Melech Wagshal will call me and</p> <p>22 now we have to pay about \$34,000 for the policy and I</p> <p>23 have to pay about -- about money like this and I will</p> <p>24 pay how much money.</p> <p>25 Q. So each time you and he would talk and</p>
<p style="text-align: right;">19</p> <p>1 A. No.</p> <p>2 Q. Does Mr. Friedman have any involvement in</p> <p>3 deciding how much to pay?</p> <p>4 A. No.</p> <p>5 Q. Does Mr. Friedman -- has he had any</p> <p>6 involvement in deciding when to make premium payments?</p> <p>7 A. No.</p> <p>8 Q. Is the amount and timing of payments</p> <p>9 something that you and Mr. Wagshal have decided?</p> <p>10 MR. BENHAIM: Objection to the</p> <p>11 form.</p> <p>12 A. I'm not understanding what --</p> <p>13 Q. Who has decided how much premium to pay to</p> <p>14 Allianz and when? Who has been making that decision?</p> <p>15 A. I and Melech.</p> <p>16 Q. You and Mr. Wagshal?</p> <p>17 A. I and Melech Wagshal and we spoke with him</p> <p>18 how much money I'm going to pay and he's going to pay.</p> <p>19 Q. Do you recall receiving things from the</p> <p>20 insurance company --</p> <p>21 A. Yes.</p> <p>22 Q. -- saying that there's money due?</p> <p>23 A. You have to pay money to the insurance, yes.</p> <p>24 Q. The insurance is not free, right?</p> <p>25 A. I know not free. Yes, they tell me I have to</p>	<p style="text-align: right;">21</p> <p>1 decide?</p> <p>2 A. Yes.</p> <p>3 Q. Other than the two of you, has anyone else</p> <p>4 been involved in those discussions about how much to</p> <p>5 pay?</p> <p>6 MR. BENHAIM: Are you talking about</p> <p>7 in the beginning or throughout the</p> <p>8 entire time?</p> <p>9 MR. GOSS: In the beginning.</p> <p>10 A. In the beginning, the broker was Abraham</p> <p>11 Friedman. Abraham Friedman told me I have to pay</p> <p>12 every month and I with Melech Wagshal we are going to</p> <p>13 pay, and I'm going to pay about something and</p> <p>14 Mr. Wagshal is going to pay about something.</p> <p>15 Q. And did Mr. Friedman help you in those</p> <p>16 payments?</p> <p>17 A. He no help me, no.</p> <p>18 Q. Now, your wife testified about efforts to --</p> <p>19 after you became trustee, efforts to sell the policy?</p> <p>20 A. Yes.</p> <p>21 Q. Was Mr. Friedman involved in that process?</p> <p>22 A. No.</p> <p>23 Q. Do you know a gentleman named Mr. Tietelbaum?</p> <p>24 A. No.</p> <p>25 Q. Perhaps he works with Mr. Friedman in his</p>

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